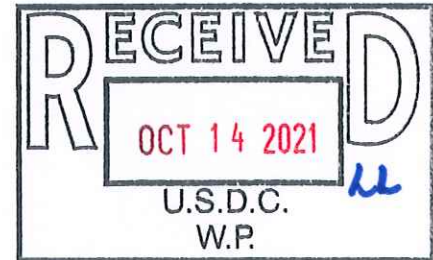


Hon. Cathy Seibel
United States District Court Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Virginia Blanco 79564.054
33 1/2 Pembroke Rd
Danbury, CT 06811

October 14, 2021

Re: U.S.A v. Blanco
16 Cr. 408 (CS)
Amend 28 U.S.C. § 2255



Dear Judge Seibel,

I am writing you to respectfully request that you allow me to submit more exhibits to support my 28 U.S.C. § 2255 motion.

On October 4, 2021, I submitted a Pro Se 28 U.S.C. § 2255 motion. At that time, I was not in control or in possession of the exhibits that I would like to add.

One of the grounds raised in my 28 U.S.C. § 2255 motion is perjury in violation of my sixth amendment. The Government was aware or should have been aware that Giovanni Marte's answers were intentional lies to cover up his extensive criminal history in front of the jury.

I ask the court's permission to allow me to submit these exhibits (see attached) in support of my 28 U.S.C. § 2255 motion. The exhibits show substantial proof that Giovanni Marte committed perjury when he was asked how many times he was arrested and proves AUSA Douglas Zolkind, AUSA Samuel S. Adelsberg, AUSA Jamie E. Bagliebter, Geoffrey S. Berman and FBI Special Agent Brendan Kenney were aware of this perjured testimony.

Q. You described your involvement in drug dealing, robberies, fights, shootouts, gun possession and drug smuggling. Were you ever arrested for these crimes?

A. Yes.

Q. How many times?

A. Once.

Q. What happened that time?

A. Got into a fistfight.

Q. When was that?

A. 2000, late 2014, early 2015.

Q. And what was the charge?

A. Assault

Q. What happened to those charges?

A. I plead guilty to disorderly conduct and assault.

Q. So other than that one arrest, were you ever arrested for any other activity that you described?

A. No

Doc.142, Pages 131-132.

I am aware that I am to respond to the Governments reply on or before January 19, 2022. With the court's permission, I would also like to submit supporting exhibits when I file my reply, the reason being is I have sent numerous Foil requests and I am awaiting responses.

If there are any issues with my first request, I respectfully request allowance to submit all exhibits when I submit my reply on January 19, 2022.

Respectfully Submitted,


Virginia Bianco

Criminal Repository for FBI Number: [REDACTED] on 06/21/2016 05:23 pm

Repository Inquiry

To: smyths For: Douglas Zolkind Case No:2013R01769 FBI Number - [REDACTED] - CRI

New York State Division of Criminal Justice Services

Alfred E. Smith Building, 80 South Swan St.

Albany, New York 12210. Tel:1-800-262-DCJS

Michael C.Green, Executive Deputy Commissioner of the NYS Division of Criminal Justice Services

Identification Summary Criminal History Job/License Wanted Missing NCIC/III**● Attention - Important Information*** See **Additional Information** at the bottom of this response for more banners pertaining to the criminal history

This NYSID Number [REDACTED] was used previously and is now reassigned to this individual.

Violent Felony offense(s) on file

● Identification Information

Name:

GOVANNY MARTE GIOVANNY S MARTE

Date of Birth:

[REDACTED]

Place of Birth :

New York USA

Cycle 3

Arrest Date August 28, 2015

Address:

[REDACTED]

Sex:	Race:	Ethnicity:	Skin Tone:
Male	White	Hispanic	Dark
Eye Color:	Hair Color:	Height:	Weight:
Brown	Black	5' 07"	160

SSN:

NYSID#:

FBI#:

NCIC Classification#:

[REDACTED]

III Status: Criminal record in other states or in multiple FBI files for NYS

● Summary Information

Total Arrests: 2 Date of Earliest Arrest: August 28, 2015 Latest Prior Arrest Date: May 23, 2016

Total Arrests:	2	Total Arraigned Arrests:	3	Total Open Cases:	3	Cycles
Felony:	2	Felony:	1			(max 5)
Violent Felony:	2	Violent Felony:	1	Felony:	1	4

Criminal Repository for FBI Number: [REDACTED] on 06/21/2016 05:23 pm

Firearm:	0	Firearm:	0	Violent Felony:	14
Misdemeanor:	0	Misdemeanor:	0	Misdemeanor:	0
Other:	0	Other:	0	Other:	0
				Open ACD:	0
				Non Docketed Cases:	14

Total Convictions:	1	Cycles (max 5)
Felony:	0	
Violent Felony:	0	
Firearm:	0	
Misdemeanor:	0	
Other:	13	
YO Adjud.:	0	

Warrant Information:	Cycles (max 5)
Failure to Appear Counts:	0
Total Open:	0
Active NYC:	0

DOC Classification:	Cycles (max 5)
Escape Charges:	0
Sex Offender Convictions:	0
Probation Revoc:	0
Parole Revoc:	0

• NYS Criminal History Information

↓ Cycle 4 Violent Felony Offense

Arrest/Charge Information

Arrest Date: May 23, 2016 06:00 am (06:00:00)

Name: GOVANNY MARTE
Date of Birth: [REDACTED]
Sex: Male
Race: White
Ethnicity: Hispanic
Height: 5' 07"
Weight: 160
Age at time of crime/arrest: 25
Address: [REDACTED]
Fax Number: B20941
Place of Arrest: NYCPD 46
Arrest Type: Unknown
Date of Crime: May 23, 2016
Place of Crime: Bronx County, NY
Criminal Justice Tracking No.: 67668499Z
Arresting Agency: NYCPD PCT 046
Arresting Officer ID: 906818
Arrest Number: B16629480
Arraignment: Bronx County Criminal Court

Arrest Charges:

- Robbery-1st:Displays What Appears To Be A Firearm
PL 160.15 Sub 04 Class B Felony Degree 1 NCIC 1299
- Robbery-1st:Forcible Theft Armed With A Deadly Weapon
PL 160.15 Sub 02 Class B Felony Degree 1 NCIC 1299

Criminal Repository for FBI Number: [REDACTED] on 06/21/2016 05:23 pm

No Court Reported Information

↓ Cycle 3 ↑
Violent Felony Offense

Arrest/Charge Information

Arrest Date: August 28, 2015 12:00 pm (12:00:00)

Name: GIOVANNY S MARTE
Date of Birth: [REDACTED]
Sex: Male
Race: White
Ethnicity: Hispanic
Height: 5' 10"
Weight: 175
Age at time of crime/arrest: 23
Address: [REDACTED]
Fax Number: M41078
Place of Arrest: NYCPD 34
Arrest Type: Unknown
Date of Crime: August 19, 2015
Place of Crime: NYCPD 34
Criminal Justice Tracking No.: 67291910P
Arresting Agency: NYCPD PCT 034
Arresting Officer ID: 923148
Arrest Number: M15664563
Arraignment: New York County Criminal Court

Arrest Charges:

-- Assault 2nd Deg: Intent To Cause Physical Injury with Weapon/Instrument
 PL 120.05 Sub 02 Class D Felony Degree 2 NCIC 1399

Court Case Information--Court: New York County Criminal Court Case Number: 2015NY055592

August 29, 2015

Initial Report Of Docket Number

August 29, 2015

Arraigned

-- Assault 2nd Deg: Intent To Cause Physical Injury with Weapon/Instrument
 PL 120.05 Sub 02 Class D Felony NCIC 1399

December 08, 2015

Convicted Upon Plea Of Guilty - Conviction Date: December 08, 2015

-- Disorderly Conduct

PL 240.20

Violation

NCIC 5311

In Full Satisfaction of:

Criminal Repository for FBI Number: [REDACTED] on 06/21/2016 05:23 pm

-- Assault 3rd Degree: With Intent To Cause Physical Injury
PL 120.00 Sub01 Class A Misdemeanor NCIC 1399

Reduced From:

-- Assault 2nd Deg: Intent To Cause Physical Injury with Weapon/Instrument
PL 120.05 Sub02 Class D Felony NCIC 1399

Sentenced to: Conditional discharge Order of Protection**Sentence Date:** December 08, 2015**Interim release Status:** Released on own recognizance (ROR)

↓ Cycle 2 ↑**No Arrest Reported****Court Case Information****--Court:** New York County Criminal Court **Case Number:** 2015NY006017

February 10, 2015

Initial Report Of Docket Number

Cycle 1 ↑**No Arrest Reported****Court Case Information****--Court:** New York County Criminal Court **Case Number:** 2015NY005672

February 04, 2015

Initial Report Of Docket Number

• Other History Related Information

There is no Other History Related Information associated with this history.

• Job/License Information

There is no Job/License Information associated with this history.

• Wanted Information

There is no NYS Wanted Information associated with this history.

• Missing Person Information

There is no NYS Missing Information associated with this history.

• Additional Information

Sentencing - Where an individual is sentenced June 1, 1981 or later on more than one charge within a docket, the sentence may be considered to be concurrent unless identified as consecutive.

Caution: Identification not based on fingerprint comparison. This record was produced as the result of an inquiry.

Multi-Source - Subject has information maintained by other states or in multiple NYS files maintained by the FBI available through the Interstate Identification Index. Refer to FBI Number [REDACTED]

https://www.ejustice.ny.gov/wps/myportal/!ut/p/a1/IZFNU4MwEIZ_Sw9ekw20EI6gBel0oLbUKbl0Upp... 6/21/2016

Criminal Repository for FBI Number: [REDACTED] on 06/21/2016 05:23 pm

Page 5 of 5

Federal NCIC, III and/or FBI Response

The outstanding response(s) indicated below will be forwarded to your in-box upon receipt by DCJS. If you do not receive one or more of the indicated responses, please contact that state or agency directly.

III Record Request**● NCIC Information**

The following information is provided in response to your request for a search of the NCIC - Person Files based on:

Name: MARTE, GOVANNY
Sex: Male
Race: White
Date of Birth: [REDACTED]
FBI number: [REDACTED]

NY030017A

NO NCIC WANT FBI/[REDACTED]
NO NCIC WANT NAM/MARTE, GOVANNY DOB/[REDACTED] RAC/W SEX/M
***MESSAGE KEY QWA SEARCHES ALL NCIC PERSONS FILES WITHOUT LIMITATIONS.

● NCIC Protection Order

The following information is provided in response to your request for a search of the NCIC - Protection Order File based on:

Name: MARTE, GOVANNY
Sex: Male
Race: White
Date of Birth: [REDACTED]
FBI number: [REDACTED]

NY030017A

NO NCIC PROTECTION ORDER FILE RECORD FBI/[REDACTED]
NO NCIC PROTECTION ORDER FILE RECORD NAM/MARTE, GOVANNY DOB/[REDACTED] RAC/W
SEX/M

WARNING: Release of any of the information presented in this computerized Case History to unauthorized individuals or agencies is prohibited by federal law TITLE 42 USC 3789g(b).
This report is to be used for this one specific purpose as described in the Use and Dissemination Agreement your agency has on file with DCJS. **Destroy after use and request an updated rap sheet for subsequent needs.**
All information presented herein is as complete as the data furnished to DCJS.

III/FBI/State Delayed Response

Additional Inquiry Response

ORI: NY030017A

US Attorney Southern District

New York State Division of Criminal Justice Services

Alfred E. Smith Building, 80 South Swan St.

Albany, New York 12210. Tel:1-800-262-DCJS

Michael C.Green, Executive Deputy Commissioner of the NYS Division of Criminal Justice Services

● **FBI Information**

The following information is provided in response to your request for a search of the FBI based on:

FBI number: [REDACTED]

Purpose Code: C

ATN/SMYTHS

***** CRIMINAL HISTORY RECORD *****

***** Introduction *****

This rap sheet was produced in response to the following request:

FBI Number [REDACTED]

Request Id

Purpose Code C

Attention

SMYTHS

The information in this rap sheet is subject to the following caveats:

This record is based only on the FBI number in your request-UCN:

[REDACTED] Because additions or deletions may be made at any time, a new copy should be requested when needed for subsequent use. (US; 2016-06-21)

All arrest entries contained in this FBI record are based on fingerprint comparisons and pertain to the same individual. (US; 2016-06-21)

The use of this record is regulated by law. It is provided for official use only and may be used only for the purpose requested. (US; 2016-06-21)

***** IDENTIFICATION *****

Subject Name(s)

MARTE, GIOVANNY S

MARTE, GIO (AKA)

MARTE, GIOVANNYSADIEL (AKA)

MARTE, GOVANNY (AKA)

Subject Description

FBI Number [REDACTED]

State Id Number [REDACTED]

(NY)

Sex

Male

Race

White

Height

5'10"

Weight

175

Date of Birth [REDACTED]

Hair Color

Eye Color

Fingerprint Pattern

III/FBI/State Delayed Response

Black

Brown

RSWURSWURSLSLSLSLSL (Other)

Place of Birth
United StatesCitizenship
United States

Fingerprint Images

(No Fingerprint Image Transmitted
Comment:)(No Fingerprint Image Transmitted
Comment:)(No Fingerprint Image Transmitted
Comment:)

Photo Images

(No Photo Image Transmitted)

(No Photo Image Transmitted)

(No Photo Image Transmitted)

(No Photo Image Transmitted)

(No Photo Image Transmitted)

***** CRIMINAL HISTORY *****

===== Cycle 001 =====
Earliest Event Date 2016-05-23

Arrest Date	2016-05-23
Arrest Case Number	NY-3502105
Arresting Agency	NYFBINR00 FBI-WHITE PLAINS
Subject's Name	MARTE,GIOVANNY SADIEL
Charge	1
Charge Literal	1211 - ROBBERY - BANKING-TYPE INST
Severity	Unknown
Charge	2
Charge Literal	5213 - FIRING WEAPON
Severity	Unknown

Court Disposition	(Cycle 001)
Court Case Number	
Court Agency	
Charge	1
Charge Literal	18 USC 2113 - BANK ROBBERY
Severity	
Disposition	(; NA)
Charge	2
Charge Literal	18 USC 924C - DISCHARGE FIREARM
Severity	
Disposition	(; NA)

===== Cycle 002 =====
Earliest Event Date 2016-05-23

Arrest Date	2016-05-23
Arrest Case Number	
Arresting Agency	NYFBIN00 FBI
Subject's Name	MARTE,GIOVANNY SADIEL
Charge	1
Charge Literal	1211-ROBBERY - BANKING-TYPE INST
Severity	Unknown
Charge	2
Charge Literal	5299-WEAPON OFFENSE
Severity	Unknown

***** INDEX OF AGENCIES *****

III/FBI/State Delayed Response

Agency FBI-WHITE PLAINS; NYFBINR00;
Agency Email Address
Agency Email Address
Address

WHITE PLAINS, NY 10605

Agency FBI; NYFBINY00;
Agency Email Address
Agency Email Address
Address

23RD FLOOR
NEW YORK, NY 102780004

* * * END OF RECORD * * *

US Department of Justice



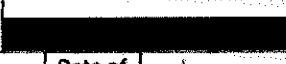





Personal History of Defendant

US Marshals Service- Southern District of New York

Form USM-312

Taken into Federal custody by the following:		Street Arrest (including arrest from LE office or court system) <input checked="" type="checkbox"/> Safekeeper: MCC <input type="checkbox"/> MDC <input type="checkbox"/> Provide number to right Register #: _____ Obtained from a correctional/ detention facility: <input type="checkbox"/> Provide writ, discharge papers, prisoner receipt, medical summary Writ/ federal writ used: N <input type="checkbox"/> Y <input type="checkbox"/> Provide writ Prior federal arrest: N <input type="checkbox"/> Y <input type="checkbox"/> Provide number above									
Last Name		MARTE		First Name		GIOVANNY		Middle Name		SADIEL	
Sex		M <input checked="" type="checkbox"/> F <input type="checkbox"/> Transgender <input type="checkbox"/>		Race		W-White/ White Hispanic <input checked="" type="checkbox"/> B-Black/ Black Hispanic <input type="checkbox"/> A-Asian/ Pacific Islander <input type="checkbox"/> I-American Indian/ Alaskan <input type="checkbox"/> U-Unknown <input type="checkbox"/>					
Hair		BLACK		Eyes		BROWN		Height		5'9"	
								Weight		175	
Date of birth											
City of birth		NY		State/ Country of birth		NY		Citizenship		USA	
FBI				State ID #				Alien #			
Resident address		City, ST, Zip code									
Home phone				Cell phone		917-780-6004		Marital status		Single	
Agency		FBI		Place/ facility of arrest				Arrest date		05/24/16	
Arrest time										0600	
NCIC code				Charge description		BANK ROBBERY		Title & code		18 USC 2113	
NCIC code				Charge description		DISCHARGE FIREARM		Title & code		18 USC 924c	
AUSA(s) assigned				ZOLKIND				Court Docket #		MAG or CR	
Defendant's counsel		Federal Defenders <input type="checkbox"/> (Has defendant seen defender? Y <input type="checkbox"/> N <input type="checkbox"/>)		CJA panel <input type="checkbox"/>		retained <input type="checkbox"/>					
Known detainers/ warrants		N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and agency: _____									
Long term medical conditions		N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and specify: _____									
Psychiatric/ emotionally disturbed		N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and specify: _____									
Injuries/ medical ailments/ post-op recovery		N <input checked="" type="checkbox"/> Y <input type="checkbox"/> and specify: _____									
The above conditions require:		Medical attention? Y <input type="checkbox"/> N <input checked="" type="checkbox"/> Medication? Y <input type="checkbox"/> (Is one day's dosage in agent possession? Y <input type="checkbox"/> N <input type="checkbox"/>) N <input type="checkbox"/>									
Medical clearance and fit for confinement document from healthcare professional				Y <input type="checkbox"/> N <input type="checkbox"/>							
Drug addiction/ alcoholism (extreme)		N <input checked="" type="checkbox"/> Y <input type="checkbox"/> Type _____ Date/ time of last use _____ Special treatment program in use _____									

Security Cautions		Current or former military <input type="checkbox"/>		Leadership role <input type="checkbox"/>		Description, continue on Page 4 as necessary	
Select any applicable		Current or former LE/ corrections <input type="checkbox"/>		Separation needs <input type="checkbox"/> Describe			
		Current or former intelligence <input type="checkbox"/>		CI <input type="checkbox"/> Describe			
		SAM subject or candidate <input type="checkbox"/>		Threat to witness <input type="checkbox"/> Describe			
Assault on LE/ corrections <input type="checkbox"/>		Other <input type="checkbox"/> Describe					
Alias 1	Last			First, MI	"G10"		Remark
Date of birth		SSN			State Driver's License		
Alias 2	Last			First, MI			Remark
Date of birth		SSN			State Driver's License		
Criminal organization name(s)						Type	
Associate/ co-defendant 1	Last			First, MI			Register #
Resident address						Phone	
City, ST, Zip code							
Associate/ co-defendant 2	Last			First, MI			Register #
Resident address						Phone	
City, ST, Zip code							
Frequented location address, City, ST, Zip code						Phone	
Remarks							
Scar <input type="checkbox"/> Mark <input type="checkbox"/>	Location			Description			
Tattoo <input type="checkbox"/>							
Scar <input type="checkbox"/> Mark <input type="checkbox"/>	Location			Description			
Tattoo <input type="checkbox"/>							
Scar <input type="checkbox"/> Mark <input type="checkbox"/>	Location			Description			
Tattoo <input type="checkbox"/>							
Scar <input type="checkbox"/> Mark <input type="checkbox"/>	Location			Description			
Tattoo <input type="checkbox"/>							
Scar <input type="checkbox"/> Mark <input type="checkbox"/>	Location			Description			
Tattoo <input type="checkbox"/>							
Internet source	E-mail <input type="checkbox"/>	Social network <input type="checkbox"/>		Address or Site & User Name			
	Website <input type="checkbox"/>	Blog <input type="checkbox"/>					
Internet source	E-mail <input type="checkbox"/>	Social network <input type="checkbox"/>		Address or Site & User Name			
	Website <input type="checkbox"/>	Blog <input type="checkbox"/>					
Languages	English: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Other Language		No <input type="checkbox"/> Yes <input type="checkbox"/> describe: _____		
	Limited <input type="checkbox"/>						
Speech characteristics	Normal <input type="checkbox"/> Accent <input type="checkbox"/>						
	Slurred <input type="checkbox"/> Stutter <input type="checkbox"/> Other <input type="checkbox"/> describe: _____						

Military service	<input type="checkbox"/> Y <input type="checkbox"/> N	Country		Branch		Entry date		Discharge date	
	Rank		Discharge type		Military occupation				
Other number			Type		Issuing State/ Country				
Other number			Type		Issuing State/ Country				
Other number			Type		Issuing State/ Country				
Other number			Type		Issuing State/ Country				
Occupation	UNEMPLOYED				Company/ employer name				
Employment address City, ST, Zip code					Phone number				
Start date		End date		Point of contact					
Bank name		Account type	Check <input type="checkbox"/> Saving <input type="checkbox"/>	Loan <input type="checkbox"/> Credit card <input type="checkbox"/>	Account number				
Branch address									
Bank name		Account type	Check <input type="checkbox"/> Saving <input type="checkbox"/>	Loan <input type="checkbox"/> Credit card <input type="checkbox"/>	Account number				
Branch address									
1: Relative name (Last, First, MI)					Relation	GIRLFRIEND	Date of birth		
Resident address City, ST, Zip code					Available phone numbers (note type)				
2: Relative name (Last, First, MI)					Relation	MOTHER	Date of birth		
Resident address City, ST, Zip code					Available phone numbers (note type)				
3: Relative name (Last, First, MI)					Relation	SISTER	Date of birth		
Resident address City, ST, Zip code	Available phone numbers (note type)								
4: Relative name (Last, First, MI)					Relation	SISTER	Date of birth		
Resident address City, ST, Zip code					Available phone numbers (note type)				
5: Relative name (Last, First, MI)					Relation	BROTHER	Date of birth		
Resident address City, ST, Zip code					Available phone numbers (note type)				
Specialized skill/ knowledge									Source & remarks

Vehicle year		Make		Model		Color(s)		
Vehicle style		State and plate #		Registration date				
VIN								
Vehicle year		Make		Model		Color(s)		
Vehicle style		State and plate #		Registration date				
VIN								
Prior Arrest	Federal <input type="checkbox"/> State <input checked="" type="checkbox"/>	Agency	NYPD	Date	1/19/15	Charge	AUG 360	Rap sheet attached <input type="checkbox"/>
Prior Arrest	Federal <input type="checkbox"/> State <input checked="" type="checkbox"/>	Agency	NYPD	Date	4/22/09	Charge	CSCS 3 rd	Rap sheet attached <input type="checkbox"/>
Prior Arrest	Federal <input type="checkbox"/> State <input checked="" type="checkbox"/>	Agency	NYPD	Date	3/30/08	Charge	CPW 4 th	Rap sheet attached <input type="checkbox"/>
Additional Information/ Remarks/ Continuation								
<p>NOTICE TO ARRESTING AGENTS: The USMS provides the COURTESY of holding and producing the arrestee prior to their Magistrate Court appearance. The arrestee is not a USMS prisoner until the US Magistrate Judge REMANDS them to USMS custody. The arresting agent is the responsible party and must be available at all times to respond to all matters concerning their arrestee. Meals are not provided to new arrestees and are the responsibility of the arresting agent to provide.</p>								
ARRESTEE PROCESSING CHECKLIST- For arresting agent and USMS personnel use								
USMS 312, prepared as completely as possible				USM-552 Prisoner Medical Records Release Form				
Arrestee photo				Medical clearance and fit for confinement document from healthcare professional, if necessary				
2 fingerprint cards				Strip search of arrestee				
BOP 9				Removal of property from arrestee				
WHCAP/ T or federal writ, if applicable				USM-18 reflecting No or any Property (USMS use only)				
Correctional facility discharge papers, if applicable				Copy of one or any combination of arrest warrant, complaint, or indictment (not necessary on writ)				
Correctional facility prisoner receipt, if applicable								
Correctional facility medical summary, if applicable								
Prepared by:	Name/agency	KENNEDY / FBI			Cell phone		Date	5/23/16
Reviewed by:	Name						Date	